

# EXHIBIT B

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

*In Re* Flint Water Cases

Case No. 16-cv-10444  
Hon Judith E. Levy  
United States District Judge

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**DECLARATION OF ARTHUR WOODSON**

Pursuant to 28 U.S.C. § 1746, I, Arthur Woodson, hereby declare as follows:

1. I am a Flint, Michigan resident, and an advocate for the residents of Flint.
2. I have been a resident of Flint since before April 2014.
3. On February 6, 2024, at 1:28 pm, I was contacted by someone seeking comment about attorney Corey Stern, for an article the person explained was being published by the New York Post.
4. When I answered the phone, the man calling asked to speak to an acquaintance of mine, Pastor Alfred Harris.
5. I initially thought the individual was a reporter for the New York Post and I explained he had the wrong number.
6. After we hung up, I was able to determine from my caller ID that the man who called me was Paul Persuad. His name was unfamiliar to me, so I did a quick internet search and discovered he works for a company named Actum.
7. I became curious about Actum and Persuad, and as a long-time Flint advocate and someone somewhat familiar with Mr. Stern's recent trial, I called Mr. Persuad back to get more information. I also took a screen shot of his name and phone number.
8. When I called him back, Mr. Persuad explained that there was going

to be an article in the New York Post about attorney Corey Stern, centered around an unflattering description of Flint Mr. Stern gave during a podcast from many years ago, and he was seeking Flint residents to comment for the story.

9. I found it strange that it was someone from a company I had not heard of, calling for a comment, rather than the reporter himself or someone else from the New York Post who was writing the story.
10. I told Mr. Persuad that Corey Stern and I have had our differences, he has said some things in the past that I do not like or agree with, and I do not always like him. But I am not interested in speaking out about him, because he seems to be one of the only lawyers left, willing to keep fighting for Flint residents against Veolia.
11. It was clear to me during the call that Veolia was coming after Corey Stern, and I told Mr. Persuad that I felt that way.
12. I also explained that I understood exactly what this was about: that Stern has been trying to get those documents, those emails, and that Veolia is just trying to make him look bad.
13. I also told him that I know Veolia is upset because of the stories about geotargeting. I then knew my instincts were right about the call coming from someone for Veolia, because Persuad asked me if I had “actually seen the judge’s ruling,” and told me that “the Judge said none of that stuff was true.” I couldn’t imagine an impartial reporter saying such a thing.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 6, 2024  
Flint, Michigan

/s/ ARTHUR WOODSON  
Arthur Woodson